

February 6, 2023

Hon. Donna M. Ryu, Magistrate Judge (N.D. Cal.)

Re: Google, LLC v. Sonos, Inc.; Case No. 3:20-cv-06754-WHA (DMR) (N.D. Cal.)

Dear Judge Ryu:

Google LLC (“Google”) respectfully submits this letter pursuant to the Court’s Order on Joint Discovery Letter Brief (Dkt. 472).

The following ECF docket entries support the statement that “Google has been found not to infringe Google Play Music, so the only remaining apps are YouTube Music”: Dkt. 316 (Summary Judgment Order) at 8-11 (finding Google Play Music does not infringe independent Claim 13 of the ’615 patent because Google Play Music does not use a “local playback queue” stored on a playback device); Dkt. 378 (Joint Discovery Letter) at 4, n.12 (noting the Court should reject Sonos’s request on Topic 1(iii)(c), relating to Google Play Music, because Sonos accused Google Play Music of infringing *only* the ’615 patent but the Court has held that Google Play Music does not infringe) (emphasis added); Dkt. 406-2 (Sonos ‘033 Infringement Chart) at 1 (accusing “the YouTube Music app, the YouTube app, the YouTube TV app, and the YouTube Kids app,” but not Google Play Music, of infringing the ‘033 patent).

Respectfully submitted,

/s/ Charles K. Verhoeven
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Charles K. Verhoeven
Melissa J. Baily
Lindsay Cooper
Marc Kaplan

Attorneys for Google LLC